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CLERK US DISTRICT COURT
SOUTHERN DISTRICT OF CALIFORNIA

DEPUTY

UNITED STATES DISTRICT COURT

SOUTHERN DISTRICT OF CALIFORNIA

'08 MJ 04 48

UNITED STATES OF AMERICA, Plaintiff, v. JAIME SANCHEZ-RAMIREZ, Defendant.	)	Magistrate Case No. ________ COMPLAINT FOR VIOLATION OF Title 18, U.S.C., Sec. 1546(a), False Making and Possession of Entry Documents; Title 18, U.S.C., Sec. 2, Aiding and Abetting

The undersigned complainant, being duly sworn, states:

On or about January 30, 2008, within the Southern District of California, defendant JAIME SANCHEZ, did knowingly forge, counterfeit, alter and falsely make immigrant documents prescribed by statute and regulation for entry into and as evidence of authorized stay and employment in the United States, namely, I-551, Resident Alien Cards; in violation of Title 18, United States Code, Section 1546(a) and Section 2.

And the complainant states that this complaint is based on the attached affidavit, which is incorporated herein by reference.

KERRI CASTILLO, SPECIAL AGENT
IMMIGRATION AND CUSTOMS ENFORCEMENT

SWORN TO BEFORE ME AND SUBSCRIBED IN MY PRESENCE, THIS 15th DAY OF FEBRUARY, 2008

UNITED STATES MAGISTRATE JUDGE

NAS

UNITED STATES OF AMERICA
v.
JAIME SANCHEZ-RAMIREZ

STATEMENT OF PROBABLE CAUSE

I, Special Agent Kerri Castillo, declare under penalty of perjury that the following statement of probable cause is true to the best of my knowledge.

Between November 2, 2006, and December 3, 2007, a Confidential Informant (hereinafter the CI) purchased nineteen fraudulent Permanent Resident Cards and twenty-one fraudulent Social Security cards from Amelia VALENTE-Hernandez. Additionally, each time the CI met with VALENTE and provided her with photos and information for the documents, ICE Agents observed her meet with Fausto CHAVEZ-Rueda, an individual previously arrested by ICE agents for manufacturing fraudulent documents.

On January 30, 2008, I provided the CI with four photos of Hispanic males and two photos of Hispanic females. Additionally, a fictitious name and date of birth was written on the back of each photo. The CI then met VALENTE at her residence and gave her the photos. Later that afternoon, a red F-150 (which is registered to CHAVEZ) parked near VALENTE'S residence. A male later identified as Jaime SANCHEZ-Ramirez exited the red F-150 and approached VALENTE'S residence located at 1125 Golden Road, Encinitas, California. Approximately five minutes later, SANCHEZ departed VALENTE'S residence and returned to the red F-150. Agents initiated surveillance of SANCHEZ who eventually did a u-turn in front of a residence located at 3331 38th Street, San Diego, California, (hereinafter the "mill") and parked the vehicle near the intersection of 38th Street and Thorn Street in San Diego. Approximately twenty minutes later, CHAVEZ exited the "mill" and briefly met with SANCHEZ in the red F-150. CHAVEZ then retuned to the "mill" and entered the residence and SANCHEZ departed the area in the red F-150. Approximately one and a half hours later, CHAVEZ departed the "mill" and shortly thereafter, met with RAMIREZ (who was still driving the red F-150) near the intersection of 41st Street and Myrtle Avenue in San Diego. CHAVEZ then returned to the "mill" and entered the residence and SANCHEZ drove the red F-150 to an AutoZone located at 3842 University Avenue in San Diego. Shortly thereafter, the CI stated he/she had spoken with VALENTE who stated she was on her way back (to her residence) with the documents. The CI returned to VALENTE'S residence to pick up the documents, which included six fraudulent Permanent Resident cards which contained the photographs, names (or variations thereof due to misspellings) and dates of birth previously provided to VALENTE by the CI and six fraudulent Social Security cards also bearing the names (or variations thereof due to misspellings) previously provided to VALENTE by the CI.

On February 14, 2008, ICE Agents arrested SANCHEZ in San Diego.

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ICE Special Agent Vincenzo Zoni read SANCHEZ his constitutional rights per "Miranda" and he stated he was willing to waive these rights and answer questions. SANCHEZ was shown Photograph Lineup Display "A," and identified photograph number three as "Pescadito" and "Gansito" and stated, "He is my sister's boyfriend, her name is Lady Sanchez." Photograph number three of Photograph Lineup Display "A" is of CHAVEZ. SANCHEZ stated he has known CHAVEZ for two or three years. SANCHEZ stated he has gone to Encinitas and other places to pick up packets as a favor to CHAVEZ. SANCHEZ claimed he did not know what was in the packets, but stated they were firm like documents. Additionally, SANCHEZ claimed CHAVEZ does not pay him. SANCHEZ stated that on January 30, 2008, CHAVEZ told him to go to "Amelia's" house. SANCHEZ stated that Amelia gave him a package that was taped and hard. SANCHEZ stated he then gave this packet to CHAVEZ when he got into the F-150. SANCHEZ stated he then went home and later CHAVEZ called him. SANCHEZ stated he met CHAVEZ on the street and he gave him one packet, which was a little thicker than the one he picked up from Amelia earlier that morning. SANCHEZ stated CHAVEZ told him to go to the AutoZone and meet Amelia, who would recognize his car. SANCHEZ stated he then met Amelia at the AutoZone, gave her the packet and she gave him around $200.00 dollars which he gave to CHAVEZ later that day. SANCHEZ claimed that he did not get any money from CHAVEZ on January 30, 2008, and just wanted to drive CHAVEZ's car.

Executed on February 15, 2008 at 1605 p.m.

KERRI CASTILLO, SPECIAL AGENT
IMMIGRATION AND CUSTOMS ENFORCEMENT

On the basis of the facts presented in this probable cause statement consisting of seven pages, I find probable cause to believe that the defendants name in this probable cause statement committed conspiracy to manufacture and possess false entry documents in violation of Title 18, United States Code, Sections 1546(a) and 2.

UNITED STATES MAGISTRATE JUDGE DATE/TIME 2/15/08 4pm